1 2	JASON M. FRIERSON United States Attorney District of Nevada		
	Nevada Bar Number 7709		
3	SKYLER H. PEARSON Assistant Unites States Attorney		
4	501 Las Vegas Boulevard South, Suite 1100 Las Vegas, Nevada 89101		
5	Tel: (702) 388-6336 Skyler.Pearson@usdoj.gov		
6	Attorneys for the United States		
7	UNITED STATES DISTRICT COURT IN AND FOR THE DISTRICT OF NEVADA		
8			
9	UNITED STATES OF AMERICA,))		
10	Plaintiff,) Case No.: 2:23-mj-0964-DJA		
11	v.) STIPULATION TO CLOSE CASE		
	JANET LEE FARNWORTH,		
12	Defendant.		
13) 		
14			
15	IT IS STIPULATED AND AGREED, by and between JASON M. FRIERSON,		
16	United States Attorney, and Skyler Pearson, Assistant United States Attorney, counsel for the		
17	United States of America, and Thuong Nguyen, Esquire, counsel for the defendant Janet Lee		
18	Farnworth, that the above-captioned matter be closed.		
19	This Stipulation is entered into based upon the following:		
20	1. On or about April 24, 2024, defendant entered into a Petty Offense Agreement		
21	with the United States in which she agreed to plead guilty to Count One of the Complaint,		
22	Operating a Motor Vehicle while Under the Influence of Alcohol, in violation of 36 C.F.R. §		
23	4.23(a)(1). See ECF No. 8.		
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2. The parties agreed to recommend that defendant be sentenced to one year of 1 unsupervised probation with the following special conditions: (i) pay a \$600.00 fine and a 2 mandatory \$10 penalty assessment; (ii) attend and complete the Lower Court 3 Counseling's (1) DUI course and (2) Victim Impact Panel; (iii) complete a sixteen (16) hour 4 online alcohol awareness course; (iv) not return to Lake Mead National Recreation Area for a 5 period of six (6) months; and (v) not violate any local, state, or federal laws for a period of six 6 (6) months. 7 If the defendant successfully completes her obligations within six months of 8 unsupervised probation, the court will allow the defendant to withdraw her guilty plea to 9 count one and the government will move to amend count one to reckless driving. 10 3. On April 24, 2024, this Court sentenced defendant pursuant to the parties' plea 11 agreement. See ECF No. 8. 12 4. Since commencing her term of unsupervised probation, defendant has 13 successfully completed conditions (i), (ii), (iii), and (iv). 14 /// 15 /// 16 /// 17 /// 18 /// 19 /// 20 /// 21 /// 22 /// 23

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1	5. As such, the parties jointly request that the defendant be allowed to withdra	
2	her guilty plea to count one and the government moves to amend count one to reckless	
3	driving. The parties also jointly request that the above-captioned matter be closed.	
4		
5	DATED this 10th day of October 20.	24.
6		Respectfully submitted,
7		JASON M. FRIERSON
8		United States Attorney
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10	<u>/s/ Thuong Nguyen</u> THUONG NGUYEN, ESQ.	<u>/s/ Skyler Pearson</u> SKYLER PEARSON
11	Attorney for Defendant JANET LEE FARNWORTH	Assistant United States Attorney
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1	UNITED STATES DISTRICT COURT IN AND FOR THE DISTRICT OF NEVADA		
2	UNITED STATES OF AMERICA,)		
3	Plaintiff,)) Case No.: 2:23-mj-0964-DJA		
4	vs.) ORDER TO CLOSE THE CASE		
5	JANET LEE FARNWORTH,)		
7	Defendant.)		
8			
9	Based on the pending Stipulation of counsel, and good cause appearing therefore, the		
10	Court finds that:		
11	1. Defendant Janet Lee Farnworth has successfully completed the conditions of her sentencing.		
12	ORDER		
13	IT IS HEREBY ORDERED that the defendant is allowed to withdraw her guilty plea		
14	to count one and that the count one be amended to reckless driving.		
15	IT IS HEREBY ORDERED that the parties move the Court in the above-captioned		
16	matter case be closed, as all requirements have been completed.		
17	DATED 1. 16th		
18	DATED thisday of October 2024		
19 20			
21			
22	UNITED STATES MAGISTRATE JUDGE		
23	*		
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